

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: Hanniford v. City of Poughkeepsie, et al
21 CIV 10359 (PMH)

THIS DOCUMENT RELATES TO:

Extension to Move for Summary Judgment

Via Ecf

Hon. Philip M. Halpern
300 Quarropas Street
White Plains, NY 10601

Dear Judge:

**Plaintiff
Responds**

Application granted to the extent the parties seek to extend Defendants' time to file a pre-motion letter for their contemplated motion for summary judgment in accordance with the Court's Individual Practices to March 10, 2023. No further extensions will be granted.

The Case Management Conference scheduled for March 8, 2023 is rescheduled to 10:30 a.m. on March 28, 2023 to be held by telephone. At the time of the conference, all parties shall call: (888) 398-2342; access code: 3456831.

The Clerk of Court is respectfully requested to terminate the motion sequence pending at Doc. 38.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 24, 2023

My office represents the Plaintiff in the above stated matter. I am submitting this joint letter for two reasons : (1) for an extension of time within which Plaintiff must respond to Defendants' pre-motion for summary judgment;(2) Adjournment of Conference.

1. Extensive to Respond to Defendants' Pre-Motion for Summary Judgment

In fact, I received Defendants' proposed statements of material facts pursuant to Local Rule 56.1 on February 10, 2023.

However, I have just returned from Africa, and have experienced health issues (a very bad cold).

For the reason stated above, I would politely ask this Court to grant my office, an additional time to respond to Defendant's pre-motion. The deadline is February 24, 2023. My office requests until March 03,2023 to respond to it. Defendants will then need until March 10, 2023 to submit the pre-motion letters.

2. Adjournment of Conference

The conference in this matter is scheduled on March 8, 2023. However, Defendants also needs until March 10, 2023 to submit their letter.

According, the parties respectfully request that the conference be adjourned until March 15, 2023.

This Plaintiff's first request for this extension, and Defendants consents to it .

My client, through his attorney, thanks this Court for its time and consideration.

Dated: February 23, 2023

Respectfully submitted,

/s/ryannekonan

cc: McCabe & Mack LLP

RYANNE G. KONAN, ESQ.
4 MARSHALL ROAD
SUITE 107
WAPPINGERS FALLS, NY 12590